Case 24-12228-amc Doc 47 Filed 03/26/25 Entered 03/26/25 15:10:31 Desc Main Document Page 1 of 2

## LOCAL BANKRUPTCŸ FORM 9014-3 IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: David Frederick Ral	ls Jr Debtor(s)	CHAPTER 13
Wilmington Savings Fund Society, FSB, not in its individual capacity, but solely as trustee of MFA 2023-INV1 Trust		
	Movant	NO. 24-12228 AMC
VS.		
David Frederick Ralls Jr  Debtor(s)		11 U.S.C. Section 362
Scott F. Waterman	Tructae	11 C.S.C. Section 302

## NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

Wilmington Savings Fund Society, FSB, not in its individual capacity, but solely as trustee of MFA 2023-INV1 Trust has filed a Motion for Relief from Stay, with the court for Relief from the Automatic Stay of Section 362.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

- 1. If you do not want the court to grant the relief sought in the motion, then on or before **April 9, 2025** you or your attorney must do <u>all</u> of the following:
  - (a) file an answer explaining your position at:

United States Bankruptcy Court Robert N.C. Nix Building 900 Market Street, Suite 400 Philadelphia, PA 19107-4299

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to movant's attorney:

Bankruptcy Group KML Law Group, P.C. Suite 5000 - BNY Mellon Independence Center 701 Market Street Philadelphia, PA 19106-1532

- 2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
- 3. A hearing on the motion is scheduled to be held before the Honorable Ashely M. Chan, the United States Bankruptcy Judge, in Courtroom 4 at the United States Bankruptcy Court, Robert N.C. Nix Building, 900 Market Street, Suite 400, Philadelphia, Pa. 19107-4299 on **April 16, 2025, at 11am**, or as soon thereafter as counsel can be heard, to consider the motion.

## Case 24-12228-amc Doc 47 Filed 03/26/25 Entered 03/26/25 15:10:31 Desc Main Document Page 2 of 2

- 4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been canceled because no one filed an answer.

/s/ Denise Carlon
Denise Carlon, Esquire
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106
Phone: (215) 627-1322 Fax: (215) 627-7734
Attorneys for Movant/Applicant
bkgroup@kmllawgroup.com

March 26, 2025